



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR-6J

June 5, 1996

Gene Liu  
U.S. Army Corps of Engineers  
215 North 17th Street  
Attn: CEMRO-ED-ED  
Omaha, NB 68201-4978

EPA Region 5 Records Ctr.



257965

Dear Mr. Liu:

The U.S. EPA and Illinois EPA have reviewed the Preliminary Design package for capping the Taracorp pile at the NL Industries site in Granite City, Illinois. U.S. EPA comments follow; Illinois EPA comments are enclosed:

General Comments:

1. Cross-reference the text to the drawings as much as possible.
2. Remove the terminology "contractor will be ordered", etc. See section 3.2.2.3.4 for examples of where this language occurs.

Specific Comments:

1. Page 1-1, Section 3.2, Second Paragraph- This paragraph should read as follows: "The remainder of this project, as discussed in the ROD, is currently being accomplished by a USACE Pre-placed contract and will not be a part of this construction contract." The rest of the paragraph should be deleted.
2. Page 1-2, Section 5.1.2, second line- insert ", Rich Oil," between "454" and "and".
3. Page 1-2, Section 5.1.2.1- the volume of material in the SLLR pile is incorrect, and the SLLR pile is not located in two general areas.
4. Page 1-2, Section 5.1.2.2, first line- replace "Tri-City Trucking" with "BV&G Transport

Company”.

5. Page 1-2, Section 5.1.3, first line- add “Based on data from the RI Report,” at the beginning of this sentence.

6. Page 1-3, Section 5.1.3- this section should be updated per Woodward-Clyde quarterly monitoring results.

7. Page 1-3- Section 5.1.5 should be Section 5.1.4.

8. Page 2-1, Section 1.1, sixth line- insert “-compliant” between “RCRA” and “cap”.

9. Page 2-1, Section 1.1, fifteenth line- insert “RCRA-compliant” between “continuous” and “cap”.

10. Page 2-1, fifth bullet point, first line- insert “with at permeability of at least 10<sup>-6</sup>” between “materials” and “to”.

11. Page 2-1, sixth bullet point- insert “Per requirements established for a RCRA cap,” at the beginning of this sentence and spell out the acronym “GCL”.

12. Page 2-1, last bullet point, first sentence- delete “top two feet of all” from this sentence and insert “to 1000 ppm lead or three feet, whichever occurs first” between “to” and “reach”. The two foot depth is an estimate of the average excavation depth that would be required to achieve 1000 ppm. It was used for cost estimates only and is not a performance standard; 1000 ppm is the performance standard for the main industrial area.

13. Page 2-2, last bullet point, first sentence- add “, if available” to the end of this sentence.

14. Page 2-3, Section 2.3.2- *this section must be discussed. These statements do not correspond with RI findings. It is also not clear whether large scale industrial pumping still occurs that influences ground water flow beneath and around the main industrial site.*

15. Page 2-4, first full sentence- This sentence must be updated per the findings of the quarterly monitoring conducted by Woodward-Clyde.

16. Page 2-4, Section 3.1.1- rewrite this section as follows: “Soil in the main industrial area will be excavated to 1000 ppm lead or three feet, whichever occurs first. This material will be consolidated with the existing Taracorp pile. The resultant expanded Taracorp pile will be graded and a RCRA-compliant cap will be placed over it. A clay liner will be constructed under all newly-created portions of the expanded Taracorp pile.”

17. Page 2-4, Section 3.2.1, third sentence- insert “a minimum of” between “a” and “6”.

18. Page 2-5- testing provisions for hazardous constituents must be added to the requirements for

fill material.

19. Sections 3.2.2.4.2, 3.2.2.4.3, and 3.2.2.5.1- when will the calculations alluded to in these sections be performed?

20. Page 2-10, Section 3.2.2.5.2.1- list the default values referenced here.

21. Page 2-11, Section 3.2.2.5.5- is random fill a term of art? If so, what are the specific requirements for it?

22. Page 2-13, Section 3.6.3- specify the frequency of visual monitoring of the grass cover.

23. Page 2-14, Section 4.3- spell out the acronym FE-6. Also specify required signage in this section.

24. Page 2-15, Section 5.3, first sentence- replace "2 feet in depth" with "to 1000 ppm lead or three feet, whichever occurs first".

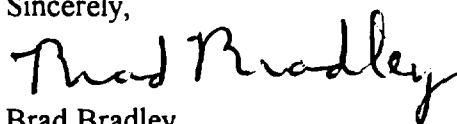
25. Page 2-15, Section 6- dust control measures must be described in detail in this document. Dust control will be one of the primary considerations in the implementation of the capping remedy. Perimeter and personal monitoring programs for lead must be outlined, and a "no visible emission" standard should be used for on-site work.

26. Drawings, Sheets 3 and 4- legend for the shaded area should be "EXCAVATE SOIL TO 1000 PPM OR THREE FEET, WHICHEVER OCCURS FIRST", and the shaded areas should be the same for both alternatives. Sheet 4 illustrates the correct area of excavation. Even though the surface of the existing pad may be less than 1000 ppm lead, materials under the pad will exceed 1000 ppm and should thus be excavated.

The enclosed Illinois EPA comments must also be addressed. Please contact me by June 14, 1996 to arrange a meeting or conference call to discuss the comments with U.S. EPA and Illinois EPA. The goals for this meeting/conference call are to clear up any questions regarding the comments, reduce non-specific comments to actual verbage for insertion in the final design, and set a schedule for submission of the final design.

Please contact me at (312) 886-4742 if you have any questions concerning this letter.

Sincerely,

A handwritten signature in black ink that reads "Brad Bradley". The signature is written in a cursive, flowing style.

Brad Bradley  
Remedial Project Manager

Enclosure

cc: Bob Rogers, Illinois EPA

bcc: S. Bianchin  
L. Nachowicz